

RELEASE AGREEMENT - FREEDOM CONVOY CLASS ACTION

WHEREAS Zexi Li is the representative plaintiff ("Li") in a proposed class action commenced in the Ontario Superior Court of Justice (**Court File Number CV-22-00088514-00CP**) against the participants of the "Freedom Convoy 2022" protest in Ottawa, Ontario (the "John Doe" defendants), who are using air horns and train horns on their vehicles in a concerted manner as a protest tactic, which is alleged to be causing significant harm to residents who live in the vicinity (the "Class");

AND WHEREAS the John Doe defendants may face significant financial damages in the proposed class action, which could be satisfied through the seizure of property;

AND WHEREAS Li views there to be great value to herself and the Class members if John Doe defendants leave Ottawa with their trucks and stop the horn tactic;

THEREFORE Li offers to settle the class action as against any individual trucker John Doe defendant and fully and finally release them from any and all damages or costs in the class action, if that person agrees to leave Ottawa, Ontario, **by 10:00am on Monday, February 7, 2022**, and to bring a motion to have the settlement confirmed by the Court pursuant to s. 27.1 of the *Class Proceedings Act, 1992*, SO 1992, c 6, at the same time as she brings a motion for certification of the action, and make it binding on behalf of herself and all other proposed Class members.

I, _____, (PRINT NAME) being a potential John Doe defendant, and driving a truck bearing licence plate # _____, hereby agree to leave Ottawa with the vehicle at the above time, and not to return to Ottawa for the duration of the Freedom Convoy protest, in exchange for Li agreeing to hereby release and forever discharge myself and the owner of the identified vehicle, and for her applying to have the settlement approved under the *Class Proceedings Act, 2022* when she brings a motion to have the class action certified.

Date: February 5, 2022


Zexi Li

Date: February _____, 2022

Signature above, print name below

NOTE: For settlement to be valid, John Doe must send a photo of this signed agreement by email to OttawaHornSettlement@gmail.com by 10:00am on February 7, 2022. If John Doe or their truck does not leave Ottawa or returns to Ottawa during the Freedom Convoy protest, the agreement will be void.